UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

Rhina Alvarenga,

Plaintiff.

v.

Civil Action No. 05-11819-JLT

Coverall of North America d/b/a Coverall Cleaning Concepts and Coverall of Boston, Sunrise Senior Living, Inc. d/b/a Sunrise of Arlington,

Defendants.

ASSENTED TO MOTION FOR AN EXTENSION OF TIME TO OPPOSE COVERALL OF NORTH AMERICA INC.'S MOTION TO STAY PROCEEDINGS PENDING ARBITRATION AND TO EXTEND TIME TO RESPOND TO THE AMENDED COMPLAINT

Plaintiff Rhina Alvarenga hereby moves for an extension of time to file an opposition to Coverall of North America Inc.'s Motion to Stay Proceedings Pending Arbitration and to Extend the Time to Respond to the Amended Complaint [Docket No. 3]. In support of her motion, Rhina Alvarenga states as follows:

- 1. Plaintiff Rhina Alvarenga's opposition to Coverall of North America's ("Coverall") motion to stay proceedings and to extend the time to answer is currently due on October 14, 2005.
- 2. Plaintiff's Motion to Remand is also pending [Docket No. 7]. If the motion to remand this action to state court is granted, Coverall's motion to stay proceedings and to extend the time to answer will be moot.

3. Coverall and Sunrise Senior Living, Inc. agree that Plaintiff may have an additional five business days from the date the Court decides Plaintiff's Motion to Remand to file an opposition to Coverall's pending motion to stay proceedings and to extend the time to answer.

For these reasons, Plaintiff Rhina Alvarenga respectfully requests that the Court (1) grant Plaintiff an extension of time to file an opposition to Coverall's Motion to Stay Proceedings Pending Arbitration and to Extend the Time to Respond to the Amended Complaint and (2) order Plaintiff's opposition to be filed five business days from the date of this Court's decision on Plaintiff's Motion to Remand.

Local Rule 7.1 Certification

Counsel for Rhina Alvarenga certifies that the undersigned conferred with counsel for the defendants and that defendants assent to the relief sought in this motion.

RHINA ALVARENGA By her attorneys,

/s/ Melissa C. Allison

Jennifer L. Huggins (BBO #642252) Greater Boston Legal Services 197 Friend Street Boston, MA 02114 617.603.1810

Daryl J. Lapp (BBO #554980) Melissa C. Allison (BBO #657470) PALMER & DODGE LLP 111 Huntington Avenue at Prudential Center Boston, MA 02199-7613 617.239.0100

Dated: October 7, 2005